

Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at http://about.jstor.org/participate-jstor/individuals/early-journal-content.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

## DIGEST OF OTHER RECENT VIRGINIA DECISIONS.

### Supreme Court of Appeals.

Note.—In this department we give the syllabus of every case decided by the Virginia Supreme Court of Appeals, except of such cases as are reported in full.

---

HENRICO COUNTY *v.* CITY OF RICHMOND et al.

Dec. 6, 1906.

[55 S. E. 683.]

**Constitutional Law—Distribution of Powers—Extension of Corporate Limits.**—Acts 1904, p. 144, c. 99 [Va. Code 1904, p. 468, § 1014a] providing for the extension of the corporate limits of cities, and authorizing the circuit judges to carry out its provisions after ordinance passed by the city affected, is not violative of the Bill of Rights or of Const. art. 3 [Va. Code 1904, p. ccxvii] requiring the legislative, executive, and judicial departments to be separate and distinct as devolving on the judges legislative powers.

Buchanan, J., dissenting.

---

PARK LAND & IMP. CO. *v.* LANE.

Dec. 6, 1906.

[55 S. E. 690.]

1. **Process—Amending Return on Summons.**—Refusal of amendment of the return on a summons, after it had been filed and so had become a matter of record, to show that the officer, when delivering a copy to defendant's wife, explained its purport to her, cannot be disturbed, she having testified that he did not explain it to her, and he, while testifying positively that he did explain it, having on cross-examination stated that to the best of his recollection he did so, and admitted that a few days before he made an affidavit in which he stated that he did not remember whether he did or not.

2. **Same—Effect of Receiving Summons.**—There having been no personal service of the summons, and the substituted service not having been good, because the officer, when delivering a copy to defendant's wife, did not explain its purport to her, jurisdiction of defendant was not obtained because of his receiving the copy from his wife in time to have made defense, though after the return day.

3. **Same—Alias Summons.**—An alias summons, issued against defendant after the court had set aside the default decree against him because the original process was not served so as to bring him into court, was properly quashed, the cause having been stricken from the